

EXHIBIT G

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	INVALIDITY ANALYSIS OF JOHNSON ET AL. U.S. PATENTS 6,023,683, 6,055,516, AND 6,505,172															
2	Citations to references are exemplary only and not intended to be exhaustive.															
3	A cell with tan shading indicates content obtained from another cell															
4	A cell with light green shading indicates a claim element that is anticipated by the reference in its column (possibly also asserted to be obvious)															
5	A cell with light yellow shading indicates a claim element that is not asserted to be anticipated by the reference in its column but is obvious															
6	A cell with light blue shading indicates a claim as a whole that is invalid for reasons other than §102 or §103.															
7	A cell with gray shading indicates matter appearing in Lawson interrogatory responses but not adopted by Dr. Shamos.															
8	A cell with rose shading indicates an element or step that is not found in the reference															
9																
10	ASSERTED CLAIMS															
11		DEPENDENCY														
12																
13																
14	172 Patent															

	A	B	R	S	Z
ASSERTED CLAIMS	DEPENDENCY				
11					
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	1. An electronic sourcing system comprising:	1P	J-CON is an electronic sourcing system. (L01234423) J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a user in a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor,	
			(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor,"		
			Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract.		
			(Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).		
			Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L"		
			"multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080		
			"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142		
15			J-CON renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, P.O. Writer, SABRE, the Gateway system, or the IBM TV 12 system.	Claim 1 is anticipated by J-CON.	
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	A	B	R	S	Z
11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately	1a	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by J-CON and Lawson's prior art system.	Dworkin discloses this element, as shown in Fig. 1:	
			J-CON maintained a database of items. "J-CON's Point-of-Sale/Total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets." L0123449. Different portions of the database could be searched separately.		
			J-CON's database contained products of multiple vendors. L0123693		
			J-CON also maintained a PartFinder database. L0123698		
			J-CON further made use of a PartSource database: "PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF." L0123472.		
17					"The database contains information about products and/or services, and the vendors who sell them. In the preferred embodiment, the database may be the equivalent of thousands of catalogs of individual suppliers." 3:65-68. Portions of the database may be searched separately: "As shown in FIG. 3, the user has the choice of searching for 1) hardware products, 2) software products, or 3) software consultants. These first three choices invoke the main function of the system, that is, to search the database for information on particular products or services."
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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
12					
13	means for entering product information that at least partially describes at least one desired item	1b	J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	In PartSource, items can be partially described via wildcards: "With PartSource you can use wild cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.	Dworkin discloses a means for entering product information that at least partially describes at least one desired item. Line items (desired items) are partially described on a display screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471. The "user interface" is the display screen.
21					The reference discloses a means for searching for search results that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-in block 31. The selection can be made by transmitting the Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time- 5:55-62. consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of which have a letter-quality speed of 40 cps or faster." 6:7-10. responsive search results is shown at L0124911.
23					A database is disclosed for searching, "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947 "When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria." 6:12-14. "Then, in block 40, the system displays the results." 6:14-15.

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	means for generating an order list that includes at least one matching item selected by said means for searching	1d J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 & L0123610-11)	The reference discloses a means for generating a list of desired catalog items that includes at least one search result selected by said means for searching	Dworkin discloses a means for generating a list of desired catalog items that includes at least one search result selected by said means for searching.	Selecting is disclosed in the reference: "At the bottom of each inclusion in an order list as described at L0124915: "You select a screen, as shown in FIG. 7, the user is given the choice of 1) part by entering its selection number at the SELECTION field. PART-FINDER then displays the number on vehicle for the part at the QUANTITY field. If you want to sell the quantity displayed, you press <RETURN>. Otherwise, you can enter a different quantity." (3) An order list of selected items and cost data is shown at L0124916.
			The user interface is a screen that displays the SELECTION field. The user interface was discussed above in connection with element '172 1b.		
25	means for building a requisition that uses data obtained from said database relating to selected matching items on said order list	1e J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.	Building requisitions is not disclosed in Dworkin. Nevertheless, it would have been obvious to use the product search and selection mechanism of Dworkin to build requisitions, as suggested, e.g., by Fisher RIMS, PO Writer, Gateway, J-CON, TV2, King Jr. or Doyle.	The reference discloses transferring data relating to selected matching items included on an order list to a requisition module: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a purchase order for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. The ticket is the requisition.
					The requisition module has access to data in the database: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts customer wants and put them on the ticket." L0123601

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11		J-CON (per supplemental invalidity defenses)		Shamoss opinion re J-CON	Shamoss Opinion re Dworkin U.S. Patent 4,992,940
12		J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The reference discloses a means for processing a requisition to generate purchase orders for requisition items.	No requisition is disclosed in Dworkin. However, as discussed above, it would have been obvious to use Dworkin to produce requisitions.	
13	means for processing said requisition to generate purchase orders for said selected matching items.	1f	A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693	The order module of Dworkin generates purchase orders. A "predetermined rule," e.g. is that a user can set up the system so he need not enter a name and address each time a product is ordered. 8:20-24.	
			The module has access to the requisition (ticket): "When you compute PO for pdmaly or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695		
31	33	1P	J-CON is an electronic sourcing system. (L0123423) 1. An electronic sourcing system comprising:	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. "An automated system assists a user in locating and purchasing goods or services sold by a (Retail) Locating Items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sale". (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information). Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080 "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	

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ASSERTED CLAIMS	DEPENDENCY				
11		J-CON (per supplemental invalidity defenses)			
12		J-CON renders claim 1 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Claim 1 is anticipated by J-CON,	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13		Additionally, J-CON renders claim 1 obvious when combined with Doyle and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Claim 1 is anticipated by J-CON		Claim 1 is anticipated by Dworkin
35		Additionally, J-CON renders claim 1 obvious when combined with the IBM TV/2 system and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'in the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'in the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'in the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.
36	a collection of catalogs of items stored in an electronic format;	1a	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	a first set of pre-determined criteria associated with said collection of catalogs;	1b	To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.	If "first set of pre-determined criteria" means restriction to specific catalogs, then items may be searched by selecting product subcategories as shown in Fig. 3.
39	a second set of pre-determined criteria associated with items from each of said catalogs;	1c	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609.	If "second set of pre-determined criteria" means restriction to types of items, then items may be searched by selecting product subcategories as shown in Fig. 4.

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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
12					
13	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor catalog; and	1d	"You might want to search for InterChange parts by manufacturer. To the extent ePlus contends that Lawson's accused system instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among competitive items from multiple sources.	"It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price." 2:66-3:2. Vendor identification code: "When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained." 2:25-29.	
42				Dworkin discloses using a first set of criteria for catalog selection (Fig. 3). The criteria can be set up so that a predetermined vendor's catalog is always searched by including that vendor's catalog in each of the categories of Fig. 3.	
43	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	1e	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471. "Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623.	The search program was discussed in connection with '172 claim 1b.
45				See also '172 1c.	

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.	J-CON renders claim 2 obvious when combined with the Fisher RIMS system or King. Additionally, J-CON renders claim 2 obvious when combined with P.O. Writer and the Fisher RIMS system or King. Additionally, J-CON renders claim 2 obvious when combined with SABRE and the Fisher RIMS system or King. Additionally, J-CON renders claim 2 obvious when combined with the Gateway system and the Fisher RIMS system or King.	To the extent Plaintiff contends that Lawson's accused system meets this limitation, so does J-CON and Lawson's prior art system. In my opinion, this limitation is not disclosed in the reference, but it would have been obvious to store catalogs of different vendors in separate databases because the catalogs originate from different vendors and would not be provided in the same format. Claim 2 is anticipated by J-CON based on Plaintiff's infringement contentions. Claim 2 is obvious in view of J-CON. Therefore, claim 2 is obvious in view of Dworkin.		Dworkin discloses a single element as "Database 3" (Fig. 1). The parties have not offered any construction of "database." I therefore take it to have its ordinary meaning to one of skill in the art. A "Database" is a collection of related information organized so that items can be inserted and retrieved. There is no disclosure in Dworkin of how Database 3 is organized. It would have been obvious, however, to store the catalogs of separate vendors in separate tables, each of which would constitute a database.
47	6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.	J -CON enabled a user to search by part numbers as a basis for searching the database for desired items. (L0123625).	J-CON also enabled searching by textual description: "At the SEARCH FOR field you can enter the first letter or letters of the part you want. For example, to see what subgroup spark plugs are in you can enter the first letter or letters product - or service can be obtained." 2:25-29.	Claim 6 is anticipated by J-CON.	The user is able to enter a product identifier (catalog number): "When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product - or service can be obtained." 2:25-29.
48			L0124925.		

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ASSERTED CLAIMS	DEPENDENCY				
11					
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	9. An electronic sourcing system comprising:	9P	J-CON is an electronic sourcing system. (L01234423) (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, ticket." Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sales). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information). Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080 "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142		
49				Claim 9 is anticipated by J-CON.	
50			J-CON renders claim 9 obvious when combined with the Fisher system, King or SABRE.		

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	a collection of catalogs of items stored in an electronic format;	9a	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'In the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON System included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	"When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained." 2:25-29.
51	a first identification code associated with a first item in a first catalog;	9b	Items in J-CON can be identified by codes, such as manufacturer's code (L0123450) or part number (L0123456).		
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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
12					
13	a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.	9c	<p>"InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start at all the vendors in the database, and the list price for the product." L0123621.</p> <p>"InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L0123628.</p>	<p>"InterChange is J-CON's electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the service appearing on the above-described display, the system POS screen except WRKSTAT or from PartFinder." L0123450.</p> <p>"If you have PartFinder you can add InterChange to your J-CON. that the same product, which will have different catalog numbers when listed by different suppliers, will all be retrieved as part of a search. The user can then request detail information about each product retrieved." For each product, the entries in FIG. 6 include a number which identifies the product, the name of the manufacturer, the manufacturer's model number for the product, the lowest price available among all the vendors in the database, the average price for the product for all the vendors in the database, and the list price for the product." L0123601.</p>	
56				<p>J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.</p>	
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ASSERTED CLAIMS	DEPENDENCY				
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12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	21. An electronic sourcing system comprising:	21P	J-CON is an electronic sourcing system. (L0123423). J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123631 et seq. ("Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a computer which is linked to a database. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123631 et seq. ("Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	To the extent that "user-generated" means "user-selected," this limitation is disclosed in Dworkin, as shown in Fig. 5. See also '172 1e.
60			J-CON renders claim 21 obvious when combined with Claim 21 is anticipated by J-CON. the Fisher RIMS system or the IBM TV/2 system.		
61	a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	21a	J-CON included mechanisms and screen displays for In PartSource, items can be partially described via wildcards in data fields: "With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.	To the extent that "user-generated" means "user-selected," this limitation is disclosed in Dworkin, as shown in Fig. 5. See also '172 1b.	

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format,	21b	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'In the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON System included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	"PART-FINDER is J-CONS electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	"PART-FINDER is J-CONS electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.
			Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.		
63	a catalog selection criteria used to select less than said entire collection,	21c	To the extent that ePlus reads the limitation to be met by Lawson's accused system i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	To the extent ePlus contends that Lawson's accused system meets this limitation, it is also met by Dworkin and Lawson's prior art system.	"It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price." 2,66-3,2.
			Searches may be limited to a particular manufacturer, "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.	See also '516 1d.	Vendor identification code: "When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained." 2,25-29.
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	21d	To the extent meaning can be ascribed to this limitation, the search described at L0123609 discloses generation of additional search criteria: "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP-SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name."	To the extent meaning can be ascribed to this limitation, the search screen of Fig. 3 generates additional search module criteria as shown in Fig. 4..	
69	a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	21e	J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617).	J-CON generated multiple purchase orders from a single requisition . "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.	This limitation is not disclosed in the reference. Nevertheless, it would have been obvious if the user selected items from multiple suppliers to generate different a purchase order for each supplier. It is impossible to generate single purchase order to more than one supplier.
70				Generation of multiple purchase orders is disclosed beginning at L0123695, e.g., "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."	

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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
12					
13	wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	21f	InterChange provides the capability to find multiple sources for generally equivalent items: "J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can convert product or service can be obtained." 2:25-29. "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. "To find an InterChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part." L0123622.		
71			Determination: "InterChange has a self-reference feature which is "When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that manufacturer codes subtitle numbers and price codes." L0124150.	Determination: "InterChange has a self-reference feature which is "When the user enters the number or identifier of a product or helpful to the novice counterperson who might look for an InterChange part for a line you carry. If an InterChange part is not found for the competitive part entered, InterChange checks to see you carry the competitive part." L0123628.	
			The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	The search is limited as shown in Fig. 3. This discloses that Dworkin had the ability to retrieve generally equivalent items (whatever that term means) and thus had the required "determination system."	
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	
13	wherein said determination system includes a cross reference table matching an identification code from a first located item with a second located item.	21h The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	The J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965	This limitation is not disclosed in the reference.	
76			"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.'	This limitation is not disclosed in the reference.	
77			The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).. The JCON system renders claim 22 obvious when combined with the Fisher RIMS system or the TV2 system.	This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part: "When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the miscellaneous information section of the POS screen." L0123485.	To the extent Plaintiff alleges this claim to be infringed by Lawson's current system, claim 22 is anticipated by J-CON.

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ASSERTED CLAIMS	DEPENDENCY				
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12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	29. An electronic sourcing system comprising:	J-CON is an electronic sourcing system. (L01234423) J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, ticket."	Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a	
			Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract.		
			Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L"		
			"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142		
79		J-CON renders claim 29 obvious when combined with Claim 29 is anticipated by J-CON under all proposed the Fisher RIMS system, King, P.O. Writer, SABRE or constructions. the Gateway system.			
80		Additionally, J-CON renders claim 29 obvious when combined with the IBM Tivoli system and the Fischer			

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	a collection of catalogs of items stored in an electronic format;	29a	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: "PART-FINDER is J-CONS electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	"PART-FINDER is J-CONS electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
81		29b	To the extent that PPlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	a first set of pre-determined criteria associated with said collection of catalogs;	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
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13	a second set of pre-determined criteria associated with items from each of said catalogs;	29c	J -CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press INDEX at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609.	If "second set of pre-determined criteria" means restriction to items, then items may be searched by selecting product subcategories as shown in Fig. 4.
85				"You might want to search for InterChange parts by manufacturer To the extent ePlus contends that Lawson's accused system instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MF-GS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among competitive items from multiple sources.	"It is another object to provide a system which replaces a plurality of catalogs, and which greatly reduces the time required in shopping for products or services. It is another object to provide a system and method as described above, wherein a user can easily shop for equipment, having specified characteristics, from a plurality of vendors, and wherein the user can easily determine which vendor offers the best price." 2,963,22.
				Vendor identification code: "When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained." 2,952,29.	

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ASSERTED CLAIMS	DEPENDENCY				
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12		J-CON (per supplemental invalidity defenses)			
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87	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	29e	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	The search program was discussed in connection with '172 line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471. "Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623. See also '172 1c.	The search program was discussed in connection with '172 claim 1b.
89	a cross reference table linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party.	29f	J-CON included a cross-reference module. (L0123450 & L0123601).	J-CON uses cross-reference tables to match identification codes: This limitation is not disclosed in the reference. "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PART-FINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965	
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ASSERTED CLAIMS	DEPENDENCY				
11					
12		J-CON (per supplemental invalidity defenses)		Shamoss opinion re J-CON	Shamoss Opinion re Dworkin U.S. Patent 4,992,940
13			"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[Type the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.		
92				Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a computer which is linked to a database. The system includes a programmed computer which is linked to a database. The system contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, service, the specifications and/or availability." Abstract.	
93	683 Patent	3P	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed (POS) to look up the parts a customer wants and put them on the ticket."	
94	3. An electronic sourcing system comprising:			Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sales"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	
95				Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080	
96				"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	
				Claim 3 is anticipated by J-CON.	
				J-CON renders claim 3 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	at least two product catalogs containing data relating to items associated with the respective sources;	3a	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'In the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON System included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.

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11	ASSERTED CLAIMS	DEPENDENCY			
12	J-CON (per supplemental invalidity defenses)	Shamoss opinion re J-CON	Shamoss Opinion re Dworkin U.S. Patent 4,992,940		
13					
98	means for selecting the product catalogs to search;	3b	To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by JCON and Lawson's prior art system. Under this theory, JCON discloses a means for selecting organized collections to search.	"You might want to search for InterChange parts by manufacturer." Thus, if the user indicates that the printer must have a letter-instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among competitive items from multiple sources.	Dworkin discloses a means for searching for search results that match the entered product information in the selected portions of the database: "The system accepts a selection from the user, in block 31. The selection can be made by transmitting the number associated with the desired item." 5:35-37. See also 5:55-62. "When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria." 6:12-14. "Then, in block 40, the system displays the results." 6:14-15.
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	means for searching for matching items among the selected product catalogs;	3c J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	The reference discloses a means for searching for search results that match the entered product information in the selected portions (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-in block 31. The selection can be made by transmitting the Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.	"Thus, if the user indicates that the printer must have a letter-quality speed of 40 cps, the system will search for printers which have a letter-quality speed of 40 cps or faster." 6:7-10. Searching cannot be performed unless the criteria are communicated to the search engine.	Dworkin discloses a means for searching for search results that match the entered product information in the selected portions of the database: "The system accepts a selection from the user, number associated with the desired item." 5:35-37. See also
			A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947	"When the user has entered these specifications, the system searches its database, in block 39, for products fulfilling the indicated criteria." 6:12-14.	
				"Then, in block 40, the system displays the results." 6:14-15.	
102	means for building a requisition using data relating to selected matching items and their associated source(s);	3d J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.	Building requisitions is not disclosed in Dworkin. Nevertheless, it would have been obvious to use the product search and selection mechanism of Dworkin to build requisitions, as suggested, e.g., by Fisher RIMS, PO Writer, Gateway, J-CON, TV2, King Jr. or Doyle.	
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	3e J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The reference discloses a means for processing a requisition to generate purchase orders for requisition items.	No requisition is disclosed in Dworkin. However, as discussed above, it would have been obvious to use Dworkin to produce requisitions.	
			A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693	The order module of Dworkin generates purchase orders. A "predetermined rule," e.g. is that a user can set up the system so he need not enter a name and address each time a product is ordered. 8:20-24.	
			The module has access to the requisition (ticket): "When you compute PO for pdmaly or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695		

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	
13	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	3f The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source. To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.	This means is not disclosed in the reference.	
109			"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.	"[Type the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.'	
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ASSERTED CLAIMS	DEPENDENCY				
11					
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	6. An electronic sourcing system comprising:	6P	J-CON is an electronic sourcing system. (L01234423) (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, ticket." Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the specifications and/or availability." Abstract. Sales). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a user in a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, ticket."	Dworkin discloses an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors: "An automated system assists a user in locating and purchasing goods or services sold by a user in a plurality of vendors. The system includes a programmed computer which is linked to a database. The database contains information about a large number of different products and/or services, arranged in various categories. For each product or service, the database contains information on price, vendor, ticket."
116			The J-CON system anticipates claim 6.	Claim 6 is anticipated by J-CON.	
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11	ASSERTED CLAIMS	DEPENDENCY	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
12					
13	a database containing data relating to items associated with at least two sources;	6a	The J-CON system includes a database of items from both primary and alternative manufacturers. (L0123613).	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'In the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON System included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.
				"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs." Therefore, J-CON included a collection of catalogs.
118	means for searching for matching items in the database;	6b	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON included a means for searching for search results that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-in block 31. The selection can be made by transmitting the number associated with the desired item." 5:35-37. See also Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of which have a letter-quality speed of 40 cps or faster." 6:7-10. responsive search results is shown at L0124911.	The reference discloses a means for searching for search results that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-in block 31. The selection can be made by transmitting the number associated with the desired item." 5:35-37. See also Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of which have a letter-quality speed of 40 cps or faster." 6:7-10. responsive search results is shown at L0124911.
				A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947	"Thus, if the user indicates that the printer must have a letter-quality speed of 40 cps, the system will search for printers Searches its database, in block 39, for products fulfilling the indicated criteria." 6:12-14.
					"Then, in block 40, the system displays the results." 6:14-15.

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	means for building a requisition using data relating to selected matching items and their associated source(s);	6c J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.		Building requisitions is not disclosed in Dworkin. Nevertheless, it would have been obvious to use the product search and selection mechanism of Dworkin to build requisitions, as suggested, e.g., by Fisher RIMS, PO Writer, Gateway, J-CON, TV/2, King Jr. or Doyle.
122	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	6d J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The reference discloses a means for processing a requisition to generate purchase orders for requisition items. A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693	No requisition is disclosed in Dworkin. However, as discussed above, it would have been obvious to use Dworkin to produce requisitions. The order module of Dworkin generates purchase orders. A "predetermined rule," e.g. is that a user can set up the system so he need not enter a name and address each time a product is ordered. 8:20-24.	
123				The module has access to the requisition (ticket): "When you compute PO for pdmaly or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695	

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	
13	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	6e The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source. To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.	This means is not disclosed in the reference.	
125				"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.	
126	26. A method comprising the steps of:	26P	The J-CON system renders claim 26 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 26 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	The reference discloses a method. Claim 26 is anticipated by J-CON, as shown below.	The reference discloses a method. Claim 26 is obvious in light of Dworkin..
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	26a	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'In the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON System included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	The user's catalog selection was described above in connection with '516 claim 1, particularly 1d.
			Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.	To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Migs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
				See also '516 1d.	
133	selecting the product catalogs to search;	26b			
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	searching for matching items among the selected product catalogs;	26c J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the service appearing on the above-described display, the system Part Index, Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609. See also '172 1c.	"When the user enters the number or identifier of a product or service appearing on the above-described display, the system shows the user the names of the suppliers from whom that product or service can be obtained." 2:25-29. See also '172 1c.	
137	building a requisition using data relating to selected matching items and their associated source(s);	26d J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses transferring data relating to selected matching items to a requisition program: When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. See also '172 1e, '683 3d.	Building requisitions is not disclosed in Dworkin. Nevertheless, it would have been obvious to use the product search and selection mechanism of Dworkin to build requisitions, as suggested, e.g., by Fisher RIMS, PO Writer, Gateway, J-CON, TV2, King Jr. or Doyle.	
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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	processing the requisition to generate one or more purchase orders for the selected matching items; and	26e J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	J-CON generated multiple purchase orders from a single requisition . "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.	No requisition is disclosed in Dworkin. However, as discussed above, it would have been obvious to use Dworkin to produce requisitions. The order module of Dworkin generates purchase orders for selected matching items.	
142	determining whether a selected matching item is available in inventory.	26f The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are product to be shipped ... " 7-54-57 shown at L0125061. See also "Warehouse Inquiry" at L0125061.	"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are product to be shipped ... " 7-54-57 shown at L0125061. See also "Warehouse Inquiry" at L0125061.	"JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450. "Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <Whse Inquiry> from any field on the POS screen except WRKSTAT." L0123451. Inventory Inquiry is described in detail starting at L012354-1.

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ASSERTED CLAIMS	DEPENDENCY				
11		J-CON (per supplemental invalidity defenses)			
12			Shamoss opinion re J-CON	Shamoss Opinion re Dworkin U.S. Patent 4,992,940	
13	28. A method comprising the steps of:	28P The J-CON system renders claim 28 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 28 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 28 obvious when combined with the IBM TV/2 system and the Fisher RIMS system, Doyle, P.O. Writer, SABRE, or the Gateway system.	The reference discloses a method. Claim 28 is anticipated by J-CON, as shown below.	The reference discloses a method.	
146	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	28a	The J-CON system maintained automotive parts information from Dworkin discloses this element, as shown in Fig. 1: multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, 'in the preferred embodiment, the database may be the model, and year, engine size, subassembly, product description, equivalent inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.	"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.	Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.

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11	ASSERTED CLAIMS	DEPENDENCY			
12		J-CON (per supplemental invalidity defenses)			
13	selecting the product catalogs to search;	28b	To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	Shamos opinion re J-CON	The user's catalog selection was described above in connection with 516 claim 1, particularly 1d.
149	searching for matching items among the selected product catalogs;	28c	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the service appearing on the above-described display, the system Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609 See also '172 1c.		

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ASSERTED CLAIMS	DEPENDENCY				
11					
12		J-CON (per supplemental invalidity defenses)		Shamos opinion re J-CON	Shamos Opinion re Dworkin U.S. Patent 4,992,940
13	converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	28f	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	"J-CON uses two types of conversion tables, vendor-specific and default. When communicating with another system, J-CON first looks to see if a table exists for the specific vendor and store. If there is not a vendor-specific conversion table, J-CON uses the default conversion table." L0124152.	This step is not disclosed in the reference.
158				J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124337.	"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse Inquiry" at L0125061.
159				The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	"JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing WRKSTAT." L0123450.
165				29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.	"Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <Whse Inquiry> from any field on the POS screen except WRKSTAT." L0123451. Inventory inquiry is described in detail starting at L0123541.

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ASSERTED CLAIMS	DEPENDENCY				
11					
12	J-CON (per supplemental invalidity defenses)		Shamoss opinion re J-CON	Shamoss Opinion re Dvorkin U.S. Patent 4,992,940	
13	The J-CON system renders claim 29 obvious when combined with the other cited prior art references as described with respect to claim 28.		Claim 29 is anticipated by J-CON.		
166					